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Attorneys for Plaintiff

**MONTANA THIRTEENTH JUDICIAL DISTRICT COURT,  
YELLOWSTONE COUNTY**

SHEILA WOLFF,

Plaintiff,

vs.

KNIGHT-SWIFT TRANSPORTATION  
HOLDINGS INC.,

Defendant.

Cause No. **DV21-01305**

Judge **MARY JANE KNESELY**

**COMPLAINT AND DEMAND  
FOR JURY TRIAL**

Plaintiff, through counsel, submits her Complaint against Defendant as follows:

1. Plaintiff Sheila Wolff is a resident of Yellowstone County, Montana.
2. Defendant Knight-Swift Transportation Holdings, Inc. is a Delaware corporation doing business in Montana.
3. The Court has subject matter jurisdiction and personal jurisdiction over the parties and this dispute.
4. Yellowstone County is the appropriate venue for this action.
5. On February 27, 2021, Plaintiff was a passenger in a 2013 Ford F350 traveling on Interstate 90 West. Plaintiff's husband, Dewey Wolff, was driving the truck.

6. The road conditions were wet, snowy, and/or icy.
7. As Plaintiff and her husband came to the area of mile marker 452.1, they came upon a multi-vehicle pileup.
8. Plaintiff's husband was able to stop the truck before colliding into any other vehicle.
9. Thereafter, a semi-tractor and trailer owned by Defendant and operated by Defendant's employee or agent, Byron Stanley, collided with Plaintiff's truck. The following photo shows the semi-tractor after the collision.



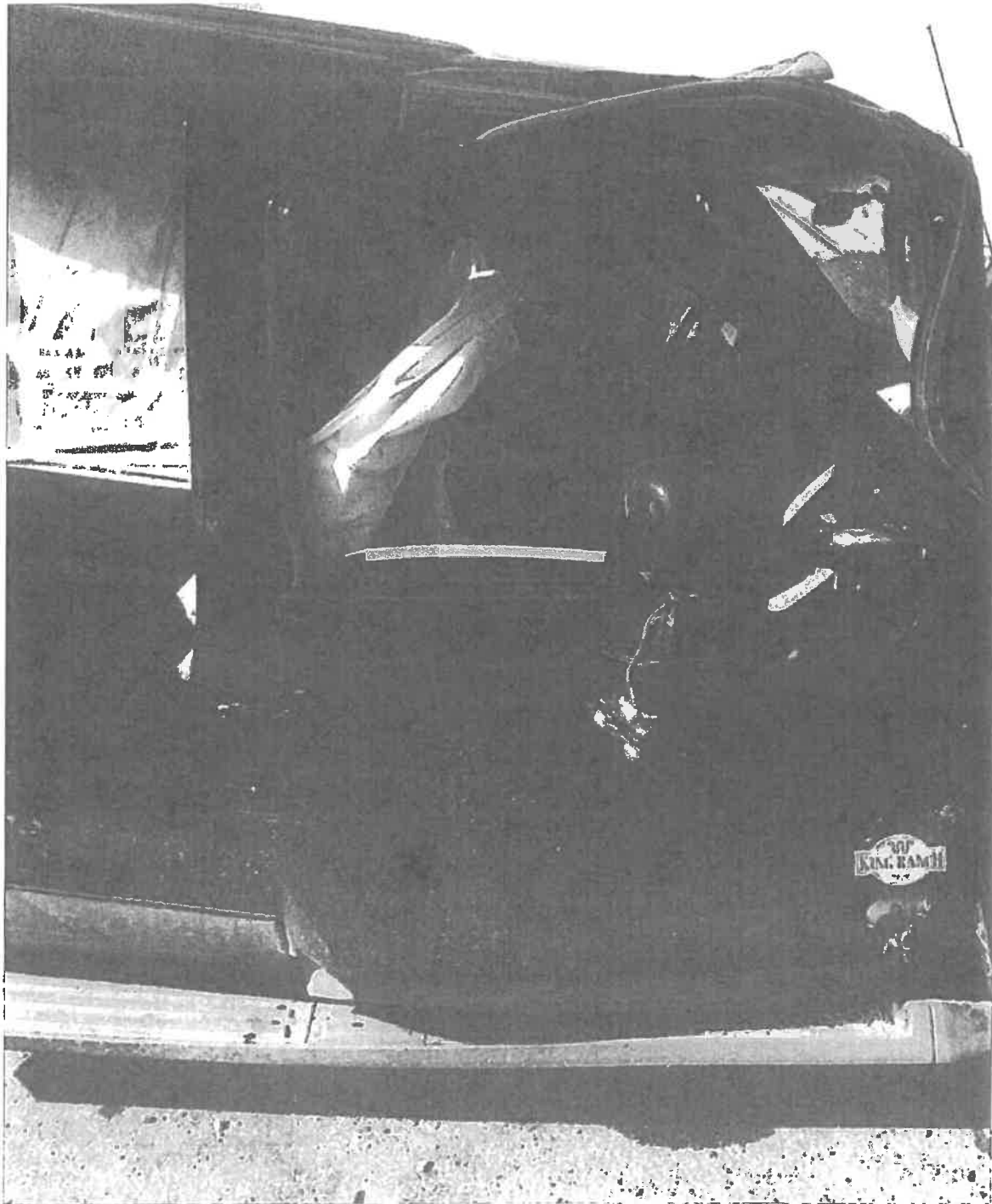
10. Plaintiff's truck was nothing more than a mangled mess after the collision.



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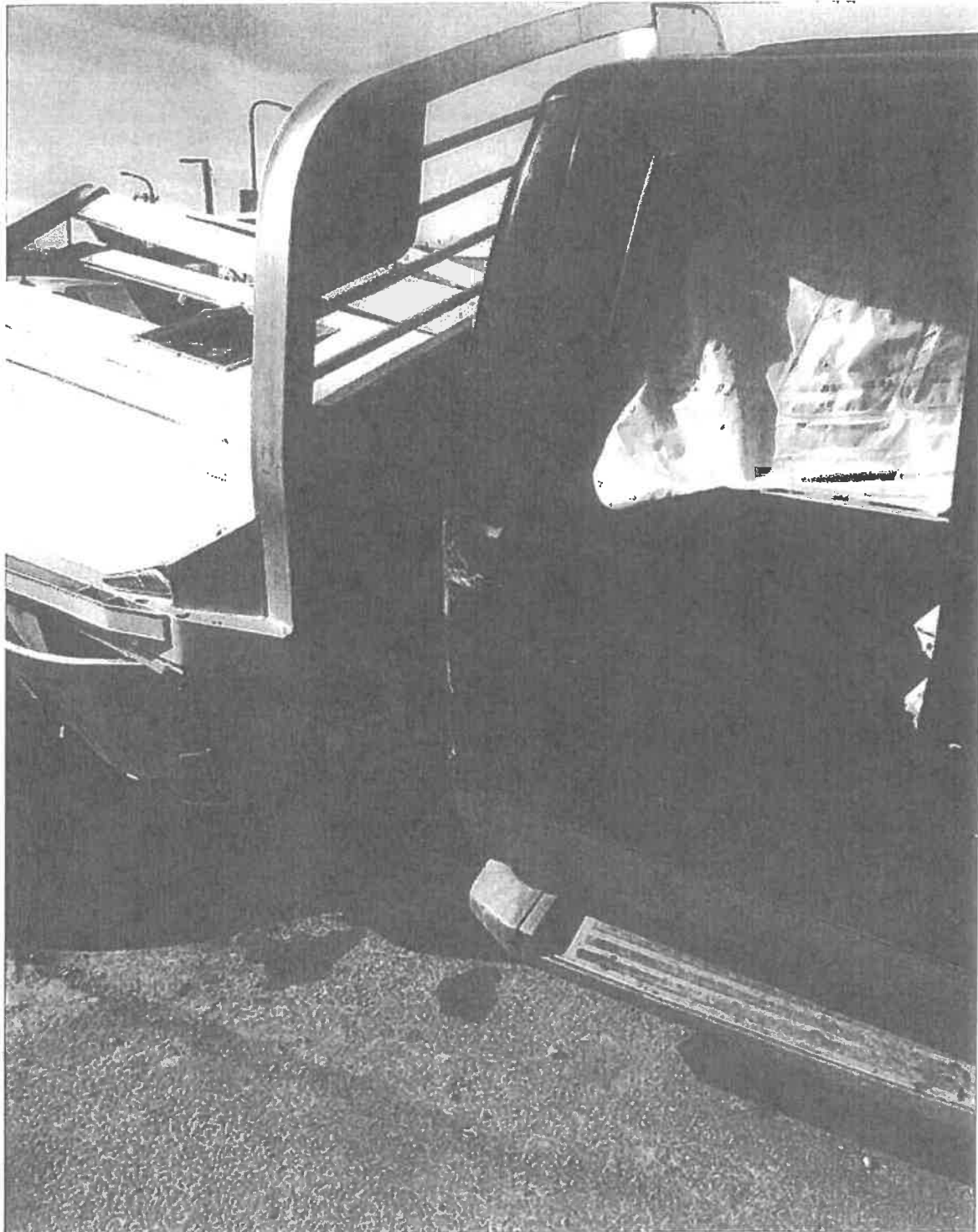


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11. The Lockwood Rural Fire District attended to Plaintiff on scene. Plaintiff had facial contusions and a “noticeable deformity to her right cheek. Plaintiff complained of pain and stated she had lost several teeth as a result of the collision.

12. The LFD placed Plaintiff on a stretcher, after which Plaintiff temporarily lost consciousness.

13. The LFD transported Plaintiff from the scene of the collision to the Billings Clinic Emergency Department.

14. At the Billings Clinic, Plaintiff complained of having difficulty seeing to her right. She also complained of seeing double.

15. Plaintiff was diagnosed with multiple right-side facial fractures. She underwent surgery that evening, during which the surgeon implanted a plate affixed with four screws to stabilize one of the fractures.

16. Plaintiff subsequently met with Summit Oral Surgery & Implant Center over several appointments in March thru June 2021, complaining of jaw pain, headaches, difficulty opening her mouth fully, a mal-aligned bite, an abscessed tooth, and sinus issues. She eventually required the extraction of a tooth, which further prolonged her pain.

17. As a result of the motor vehicle collisions, Plaintiff has suffered significant personal injuries, emotional distress and mental anguish, and financial damages.

18. Defendant owed a duty to use reasonable care in the operation of Defendant's semi-tractor and trailer.

19. Defendant breached its duty of care by operating Defendant's semi-tractor and trailer too fast for the road conditions.

20. Defendant's acts/omissions constituted negligence, and its negligence caused the collision with Plaintiff's vehicle and caused Plaintiff's injuries.

21. Defendant is liable for the negligent acts/omissions of Byron Stanley under the doctrine of respondeat superior.

WHEREFORE, Plaintiff respectfully requests a judgment against Defendant for all general and special compensatory damages provided by Montana law, in an amount

to be proven at trial; for costs, interest, and pre-judgment interest as determined by the Court; and for any and all further legal or equitable relief as the Court deems proper.

**DEMAND FOR JURY TRIAL**

Plaintiff demands a trial by jury in this matter.

Dated this 9th day of October, 2021.

  
Joseph Cook  
Attorney for Plaintiff



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HOLDINGS INC.,

Defendant.

Cause No.

**D V 2 1 - 0 1 3 0 5**

Judge

**MARY JANE KNISELY**

**SUMMONS**

TO: Knight-Swift Transportation Holdings Inc., Defendant.

A lawsuit has been filed against you.

Within 21 days after service of this summons on you or (42 days if you are the State of Montana, a state agency, or a state officer or employee), you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Montana Rules of Civil Procedure. Do not include the day you were served in your calculation of

time. The answer or motion must be served on the plaintiff or plaintiff's attorney, if plaintiff is represented by an attorney, whose name and address are listed above.

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint.

You also must file your answer or motion with the court.

DATED this 20th day of October, 2021.

Terry Halpin, Clerk

(Seal)

By Heidi Buys  
Deputy Clerk